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Attorneys for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Manuel Bandres Oto, et al.,)	
)	No. CV-16-01027-PHX-DJH
Plaintiffs,)	
)	STIPULATION RE: SCHEDULE TO
v.)	RESPOND TO ATCA’S MOTION TO
)	DISMISS
Airline Training Center Arizona, Inc.,)	
)	(Second Request)
Defendant.)	
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In light of the Court’s Order of June 21, 2016 denying Plaintiffs’ unopposed motion to seek discovery prior to responding to “Defendant ATCA’s Inc.’s Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6) or, Alternatively, for Summary Judgment or, in the Further Alternative, to Dismiss on the Grounds of *Forum Non Conveniens*”, counsel for the parties have met and conferred and, subject to the approval of the court, agreed that Plaintiffs shall have until July 31, 2016 to file their opposition to ATCA’s omnibus motion.

1 Because the Defendant's omnibus motion combines requests for relief under
2 F.R.C.P. 12(b)(6), F.R.C.P. Rule 56 and for dismissal on grounds of *forum non*
3 *conveniens* ("FNC"), L.R.Civ. 7.2 specifies different times to respond for the different
4 elements of the motion; i.e., 14 days for the 12(b)(6) and FNC components and 30 days
5 for the summary judgment component. However, the times are not cumulative.
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7 This Stipulation shall not preclude a request for a further extension of time for
8 good cause shown.
9

10 Dated this 23rd day of June, 2016

11 KREINDLER & KREINDLER LLP

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13 By /s/ Brian J. Alexander

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